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	REBECCA A. PETERSON (241858)	
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7	Attorneys for Plaintiffs [Additional Counsel on Signature Page]	
8	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION	
9		
10	OTHE IND	Division
	LUDAMA CUMUARON IANDE)
11	LUDMILA GULKAROV, JANINE TORRENCE, KELLY MCKEON, and JOSH) Case No. 21-cv-00913-YGR
12	CRAWFORD, Individually and on Behalf of	,)
13	All Others Similarly Situated,) DECLARATION OF REBECCA A.
1.4	Plaintiffs,) PETERSON IN RESPONSE TO) DEFENDANTS' OBJECTION TO
14	V.) CONSOLIDATION STIPULATION
15)
16	PLUM, PBC, and PLUM, INC., Delaware corporations,))
17	-)
	Defendants.)
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28	DECLARATION OF REBECCA A. PETERSON IN RESPONSE TO DEFENDANTS'	

DECLARATION OF REBECCA A. PETERSON IN RESPONSE TO DEFENDANTS'
OBJECTION TO CONSOLIDATION STIPULATION
Case No. 21-cv-00913-YGR

I, Rebecca A. Peterson, declare as follows:

- 1. I am a partner at Lockridge Grindal Nauen P.L.L.P. and represent Plaintiffs in the above-captioned matter. I submit this declaration in response to Defendants' Objection to Consolidation Stipulation.
- 2. I met and conferred with defense counsel concerning the consolidation of the various cases. Defendant Plum PBC's position is that Plum supports a single complaint, consolidating all pending Northern District California consumer class actions.
- 3. During the meet and confer process, I sent a copy of the proposed stipulation to Defendant Plum PBC's counsel, Dale J. Giali. This draft stipulation included the same requested relief as the stipulation filed on April 6, 2021. ECF. 29. The only difference was the proposed dates for any leadership papers and the filing of the consolidated complaint.
- 4. In response to the draft stipulation, defense counsel stated that it "does not take a position (or may oppose)" the additional items in the stipulation that go beyond consolidation and filing a single consolidated complaint. There was no later confirmation that Defendant decided it would oppose (instead of taking no position) the additional items in the stipulation. Defense counsel's response also provided Defendant's position and how that position must be communicated in any stipulation or motion. These instructions were followed by Plaintiffs in the filed April 6, 2021 stipulation.
- 5. Plaintiffs' counsel further conferred with defense counsel on April 7, 2021 and confirmed that both parties agree proper notice was given on what relief would be sought in the now filed stipulation.
- 6. Attached hereto as Exhibit 1 is a true and correct copy of a Plum Inc.'s Corporation Statement of Information from the California Secretary of State.

1	7. Attached hereto as Exhibit 2 is a true and correct copy of Plum Organic's Terms of	
2	Use (downloaded on March 9, 2021).	
3	I declare under penalty of perjury under the laws of the United States that the foregoing is	
4	true and correct.	
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6	Executed this 7 th day of April 2021.	
7	s/ Rebecca A. Peterson Rebecca A. Peterson	
8	Attorney for Plaintiff	
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28	-3- DECLARATION OF REDECCA A DETERMINING DECEMBANTS?	